

STATE OF ILLINOIS	
ILLINOIS COMMERCE COMMISSION	Docket No. 07-0177
<p style="text-align: center;">Application of</p> <p style="text-align: center;">Glacial Energy of Illinois</p> <p style="text-align: center;">for Certification</p> <p style="text-align: center;">as an Alternative Retail Electric Supplier</p>	

ILLINOIS
 COMMERCE COMMISSION
 2007-01-29 A 9:20 AM
 CHIEF CLERK'S OFFICE

PETITION TO INTERVENE OF TMS ENERGY SERVICES

TMS Energy Services, ("TMS"), by its principal, Thomas Sobey, hereby petitions for leave to intervene herein and respectfully states as follows:

1. On March 8, 2007, Petitioner Glacial Energy of Illinois ("Glacial") filed an application for a certificate as an alternative retail electric supplier.
2. As part of that application, Glacial attempted to demonstrate compliance with the financial, technical and management requirements of the certification rules.
3. Specifically, the application identified Amy Gasca as an experienced, competent person of integrity that could be trusted to supervise such a company as the Chief Operating Officer.

4. Attached hereto as Exhibits A through E are documents filed with the Bankruptcy Court of the Southern District of Texas, Houston Division showing that there should be serious concern about the management identified for Glacial Energy of Illinois. Further, the Commission would best serve the citizens of Illinois if it conducted a full investigation into the activities of Ms. Gasca in the retail energy market in Texas before determining if Glacial Energy meets the requirements required under the Illinois Code. The documents show that as the CEO and Majority owner of AmPro Energy Ms. Gasca terminated service to more than 3000 customers with 10 days notice. This occurred on December 20, 2005 at a time when the Texas retail market hit a record high price for electricity. Ms. Gasca claimed that adverse regulatory changes caused her demise, but she cannot explain why her company was the only one of more than 125 Retail Electric Providers to be damaged. The documents contain many more issues which address her performance as a corporate executive.
5. For purposes of the service list, the following persons are designated to receive service on behalf of TMS in this proceeding:

Thomas Sobey

18011 Isle Royale Court, Humble, Texas 77346

tmsenergy@hotmail.com
6. TMS agrees to accept service by electronic means as provided for in Section 200.1050 of the Commission's Rules of Practice. (See 83 Ill. Adm. Code 200.1050.)

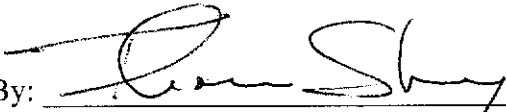
WHEREFORE, Petitioner prays as follows:

1. That TMS Energy Services be granted leave to intervene herein; to become a party hereto; to examine and cross-examine witnesses; to adduce evidence herein; and to provide argument; and

2. That the Commission grant such further additional relief as it deems appropriate.

Respectfully submitted,

TMS ENERGY SERVICES

By: 


Thomas Sobey

5 April 07

VERIFICATION

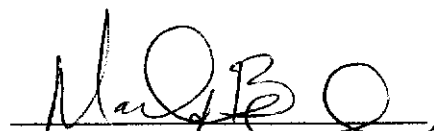
STATE of TEXAS)
)
County of Harris) ss:

Thomas Sobey, being first duly sworn, deposes and says that he is the Principal and Sole Proprietor of TMS Energy Services; that he has read the foregoing Petition to Intervene of TMS Energy Services in Docket #07-0177, and all of the Exhibits accompanying and referred to within the Petition; and that the statements contained in the Petition and the Exhibits are true, correct, and complete to the best of his knowledge, information, and belief.



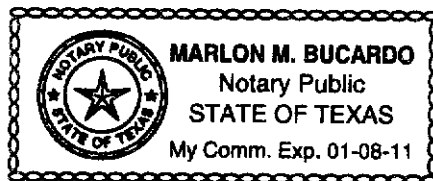
Thomas Sobey

Subscribed and sworn to before me
this 07 day of April, 2007.



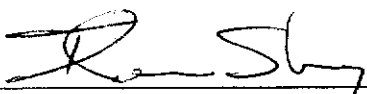
Notary Public

(Stamp of Notary)



SERVICE LIST

The undersigned certifies that copies of the Motion to Intervene of TMS Energy Services in Docket #07-0177 have been served on parties shown on the below Service List by e-mail, from Humble, Texas, on April 7, 2007.


Thomas Sobey

SERVICE LIST

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